

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

GIOVANNI MARIN IRIZARRY
WALESKA OLIVO SANTIAGO

Case No. 19-04547
Chapter 13

Debtors

MOTION REQUESTING EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW Debtors, represented by undersigned counsel, and very respectfully allege and pray as follows:

1. On April 30, 2020, Firstbank filed a Motion to Dismiss the above captioned case alleging that the Debtors are in arrears with the Trustee. See, Dk. #44.
2. The Debtors have been making payments, however, they need more time to become current with the Trustee.
3. Accordingly, the Debtors respectfully request an extension of time of twenty-one (21) days to respond to the Motion to Dismiss.
4. The preceding request is made in good faith and is not intended to delay the instant proceeding or cause undue hardship to any creditor.

WHEREFORE, Debtors respectfully request from this Honorable Court an extension of time of twenty-one (21) days to respond to the Motion to Dismiss.

CERTIFICATE OF SERVICE: I hereby certify that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF system, which will send notification, upon information and belief, of such filing to the following: CHAPTER 13 TRUSTEE AND THE UNITED STATES TRUSTEE and to all CM/ECF participants.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 31th day of May 2020.

THE BATISTA LAW GROUP, PSC.

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